[PROPOSED] ORDER GRANTING MOTION TO SEAL

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[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Consider Whether Google's Materials Should Be Sealed regarding Plaintiffs' Response to Google's Administrative Motion (Dkt. 833) Re: the Court's Order to Show Cause ("Motion"). Having considered the Motion and supporting declarations, and good cause having been found, the Court **ORDERS** as follows:

6	Document	Court's Ruling	Reason(s) for Court's Ruling
7		on Motion to Seal	
8	Plaintiffs' Response to the Court's Order to Show	GRANTED as to redacted portions	The information requested to be sealed contains Google's highly confidential and
9	Cause (DKT. 784)	at:	proprietary information regarding highly sensitive features of Google's internal
10		Pages i:19, i:21,	systems and operations, including various
11		1:9-12, 1:15, 1:18, 2:19, 2:23, 2:25,	types of internal projects, data fields and logs, and their proprietary functionalities,
12		3:27, 4:22, 6:3,	as well as internal metrics, as well as
13		6:19, 7:13, 7:18-22, 8:11, 8:19, 8:22-23,	internal metrics, that Google maintains as confidential in the ordinary course of its
$_{14}$		9:1, 9:12, 9:23-24, 9:26, 11:11, 11:22-	business and is not generally known to the
		23, 11:25-27, 12:2,	public or Google's competitors. Such confidential and proprietary information
15		12:4-5, 12:8, 12:14-	reveals Google's internal strategies,
16		15, 12:22, 13:3-4, 13:13, 13:18, 13:20,	system designs, and business practices for operating and maintaining many of its
17		14:6-7, 14:10,	important services, and falls within the
18		14:13, 14:17, 14:25, 16:1, 16:3, 16:8-9,	protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3.
19		16:12-13, 16:19, 16:25-26, 17:7,	Public disclosure of such confidential and
20		17:12, 17:15-16,	proprietary information could place Google at an increased risk of
$\begin{bmatrix} 21 \end{bmatrix}$		18:9, 24:8, 25:27	cybersecurity threats, as third parties may seek to use the information to
			compromise Google's internal practices
22	Entitle 1 to Mar Destaurtion	CD ANTED A-	relating to competing products.
23	Exhibit 1 to Mao Declaration	GRANTED as to redacted portions	The information requested to be sealed contains Google's highly confidential and
24		at:	proprietary information regarding highly
25		Pages 8:14, 8:26,	sensitive features of Google's internal systems and operations, including various
26		10:5, 10:13, 10:24	internal metrics, that Google maintains as
27			confidential in the ordinary course of its business and is not generally known to the
			public or Google's competitors. Such
28			confidential and proprietary information

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	Exhibit 2 to Mao Declaration	GRANTED as to redacted portions at: PDF Pages 4-6	reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
	Exhibit 3 to Mao Declaration	GRANTED as to redacted portions at:	relating to competing products. The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly
		Pages 1-2	sensitive features of Google's internal systems and operations, including a particular data field and its proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies and

1			business practices, and falls within the
$_{2}\Vert$			protected scope of the Protective Order
²			entered in this action. See Dkt. 81 at 2-3.
3			Public disclosure of such confidential and proprietary information could place
4			Google at an increased risk of
ہ			cybersecurity threats, as third parties may
5			seek to use the information to
6			compromise Google's internal practices
	Exhibit 4 to Mao Declaration	GRANTED as to	relating to competing products. The information requested to be sealed
7	Exhibit 4 to Mao Deciaration	redacted portions	contains Google's highly confidential and
8		at:	proprietary information regarding highly
			sensitive features of Google's internal
9		PDF Pages 2-3	systems and operations, including a
10			particular data field, that Google
			maintains as confidential in the ordinary
11			course of its business and is not generally known to the public or Google's
12			competitors. Such confidential and
12			proprietary information reveals Google's
13			internal strategies, system designs, and
14			business practices for operating and
1'			maintaining many of its important
15			services, and falls within the protected scope of the Protective Order entered in
16			this action. See Dkt. 81 at 2-3. Public
			disclosure of such confidential and
17			proprietary information could place
18			Google at an increased risk of
			cybersecurity threats, as third parties may seek to use the information to
19			compromise Google's internal practices
20			relating to competing products.
21	Exhibit 6 to Mao Declaration	GRANTED as to redacted portions	The information requested to be sealed contains Google's highly confidential and
22		at:	proprietary information regarding highly
		Pages 10:7-8,	sensitive features of Google's internal systems and operations, including an
23		13:12, 149:21,	internal project, that Google maintains as
24		150:1, 150:12-13,	confidential in the ordinary course of its
25		151:8, 152: 4-5,	business and is not generally known to the
23		152:25	public or Google's competitors. Such
26			confidential and proprietary information reveals Google's internal strategies,
27			system designs, and business practices for
			operating and maintaining many of its
28			important services, and falls within the
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		protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. The information requested to be sealed also contains an individual's personally identifying information.
Exhibit 7 to Mao Declaration	GRANTED as to	The information requested to be sealed
	redacted portions	contains Google's highly confidential and
	at:	proprietary information regarding highly sensitive features of Google's internal
	PDF Pages 4-5	systems and operations, including
		particular data fields and logs, that
		Google maintains as confidential in the
		ordinary course of its business and is not generally known to the public or
		Google's competitors. Such confidential
		and proprietary information reveals
		Google's internal strategies, system
		designs, and business practices for operating and maintaining many of its
		important services, and falls within the
		protected scope of the Protective Order
		entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and
		proprietary information could place
		Google at an increased risk of
		cybersecurity threats, as third parties may
		seek to use the information to compromise Google's internal practices
		relating to competing products.
Declaration of Christopher	GRANTED as to	The information requested to be sealed
Thompson in Support of	redacted portions	contains Google's highly confidential and
Plaintiffs' Supplemental Sanctions Brief	at:	proprietary information regarding highly sensitive features of Google's internal
Dunctions Direct	Pages 2:6, 2:17-18,	systems and operations, including various
	2:20, 2:25, 3:11,	types of internal projects, data fields and
	3:27, 4:1, 4:5-6,	logs, and their proprietary functionalities,
	4:13, 5:7, 5:11, 5:13-15, 6:3, 6:5-6,	as well as internal metrics, that Google maintains as confidential in the ordinary
	6:8-13, 6:15-16,	course of its business and is not generally
	6:18-28, 7:1-2, 7:5-	known to the public or Google's
		competitors. Such confidential and

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1			6, 7:24-27, 8:17, PDF page 13	proprietary information reveals Google's internal strategies, system designs, and
2			1DI page 13	business practices for operating and
3				maintaining many of its important services, and falls within the protected
4				scope of the Protective Order entered in
5				this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
6				proprietary information could place
7				Google at an increased risk of cybersecurity threats, as third parties may
				seek to use the information to
8				compromise Google's internal practices relating to competing products.
9		Declaration of Jay Bhatia in	GRANTED as to	The information requested to be sealed
10		Support of Plaintiffs' Response to Google's	redacted portions at:	contains Google's highly confidential and proprietary information regarding highly
11		Response to the Order to	at.	sensitive features of Google's internal
		Show Cause	Pages 2:3-5, 2:12, 3:3-6, 3:8-10, 3:14-	systems and operations, including source
12			16, 3:18-19, 3:22,	code, particular data fields and their proprietary functionalities, as well as
13			3:26-27, 4:7, 4:9,	internal metrics, that Google maintains as
14			4:11-12, 4:16-17, 4:20	confidential in the ordinary course of its business and is not generally known to the
15				public or Google's competitors. Such
16				confidential and proprietary information reveals Google's internal strategies,
17				system designs, and business practices for operating and maintaining many of its
18				important services, and falls within the protected scope of the Protective Order
19				entered in this action. See Dkt. 81 at 2-3.
20				Public disclosure of such confidential and proprietary information could place
21				Google at an increased risk of
$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$				cybersecurity threats, as third parties may seek to use the information to
$\begin{bmatrix} 22 \\ 23 \end{bmatrix}$				compromise Google's internal practices relating to competing products.
				relating to competing products.
24	S	O ORDERED.		
25		DATED:		
26				I. SUSAN VAN KEULEN
27			Unite	ed States Magistrate Judge
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